

EXHIBIT F

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CITY OF ALMATY, KAZAKHSTAN and BTA
BANK JSC,

Plaintiffs,

-against-

MUKHTAR ABLYAZOV, VIKTOR
KHRAPUNOV, ILYAS KHRAPUNOV, and
TRIADOU SPV S.A.,

Defendants.

No. 15-CV-05345(AJN)

**AFFIDAVIT OF
ILYAS KHRAPUNOV**

I, ILYAS KHRAPUNOV, being duly sworn, deposes and state as follows:

1. I am a Crossclaim Defendant in the above matter; as such, I am fully familiar with the facts and circumstances of this litigation.
2. I am aware that Kenges Rakishev was deposed on October 11, 2017.
3. On October 12, 2017, my attorney John Curley forwarded to me by email a rough copy of the transcript of the deposition of Kenges Rakishev. I did not share or send the rough copy transcript to anyone else at that time, or any time thereafter.
4. Shortly thereafter, Allison Angel forwarded to me by email a final copy of the transcript of the deposition of Kenges Rakishev ("the Transcript"). I did not share or send the Transcript to anyone else at that time, or any time thereafter.
5. After reviewing the Transcript, I noticed several inconsistencies between Mr. Rakishev's testimony and the statements that BTA Bank made in a related and ongoing UK matter (JSC BTA Bank v. Ablyazov, Case No: CL-2015-000549). I contacted my attorneys at Hoguet Newman Regal and Kenney to ask that they take the necessary steps to lift the

confidential designation from the Transcript so that I would be able to share it with my London attorneys and the UK Courts.

6. I have not provided my London counsel, or anyone else, with any copy of the Transcript (rough or final), as I am awaiting the Court's decision on our request to lift the confidentiality designation.

7. I did not send any version of the Transcript (rough or final) to anyone at the Russian website ura-inform.com.

8. I do not know how the Russian website ura-inform.com obtained the transcript of the deposition of Kenges Rakishev.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: November 2, 2017


ILYAS KHRAPUNOV